

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

RYAN RICHMOND, PRO SE,
PLAINTIFF,

v.

CORRECT CARE SOLUTIONS LLC,
DEFENDANTS

CA. No : 14-cv-806-LPS



MOTION FOR CLERK TO ENTER DEFAULT

NOW COMES, PLAINTIFF RYAN RICHMOND, PRO SE, PURSUANT TO THE FED.R.CIV.P.55(a), IS DECLARING THAT (THE DEFENDANTS) ARE IN DEFAULT FOR FAILING TO PLEAD OR OTHERWISE DEFEND. PLAINTIFF RICHMOND AVERS THE FOLLOWING:

1. JUNE 16TH, 2014, PLAINTIFF FILED HIS COMPLAINT.
2. MAY 29TH, 2015, PLAINTIFF AMENDED HIS COMPLAINT.
3. JANUARY 13TH, 2016 THE USM-285 FORMS WERE SERVED TO THE LEGAL COUNSEL OF PATRICIA MUNDA, PAMELA MAGEE, CORRECT CARE SOLUTIONS LLC, SARAH CLARTI, AND PHYSICAL THERAPIST SHAWN.
4. JANUARY 12TH, 2017 THE LEGAL COUNSEL OF PAMELA MAGEE, CORRECT CARE SOLUTIONS LLC ANSWERED AND SEPERATED DEFENSES TO THE PLAINTIFF RYAN RICHMOND'S AMENDED COMPLAINT
5. ~~RECEIVED~~ APRIL 11TH, 2017 THE DEFENDANTS PATRICIA MUNDA, SARAH CLARTI, AND PHYSICAL THERAPIST SHAWN FAILED TO PLEAD OR OTHERWISE DEFEND THE ORIGINAL, AND AMENDED COMPLAINT THAT WAS SERVED JANUARY 13TH, 2016.

WHEREFORE, PLAINTIFF RESPECTFULLY ASKS THIS HONORABLE COURT
PURSUANT TO FED.R.CIV.P. 55(a) TO ENTER A DEFAULT FOR THE
ABOVE CAPTIONED CASE ON THE ABOVE MENTIONED NAMES FOR
FAILING TO PLEAD OR OTHERWISE DEFEND.

PURSUANT TO 28 U.S.C. § 1746, I DECLARE UNDER PENALTY OF
PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

RESPECTFULLY SUBMITTED,


RYAN RICHMOND, PRO SE
SB# 610577
HRYCI
P.O. BOX 9561
WILM. DE, 19809

DATED: ~~APRIL 11TH, 2017~~
APRIL 11TH, 2017

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

AFFIDAVIT OF SERVICE

I, RYAN RICHMOND, BEING SWORN, STATE THAT:

I HAVE SERVED A COPY OF THE MOTION FOR CLERK TO ENTER DEFAULT, VIA MAIL BY WAY FOR THE DEPARTMENT OF CORRECTIONS ON THE 11TH DAY OF APRIL, 2017

PURSUANT TO 28 U.S.C. § 1746, I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

DATED: APRIL 11TH, 2017



RYAN RICHMOND
SBI #610577
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P.O. BOX 9561
WILM. DE, 19809

Ryan Richmond SBI# 610577
HYCI
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12 APR 2017 FILED 4:47

D.S.M.S.
X-RAYS

OFFICE OF THE CLERK
UNITED STATES DISTRICT COURT
844 N. KING ST. UNIT 18
WILM. DE, 19801

Legal Mail

MAIL

LEGAL

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